

### **Remarks**

By this amendment, independent claims 1, 8 & 15 are amended to recite tracking a length of time that the status indicator has at least one of an entered setting, an audit passed setting, an audit failed setting, or a re-entered setting. The length of time tracked is then employed to audit the invoice entry process. In addition, new claims 15 & 16 are added to further characterize applicants' novel functionality. Support for the amended claim language and the new claims can be found at page 6, line 25 – page 7, line 13 of the specification, as well as at page 3, lines 16-18. No new matter is believed added to the application by any amendment presented.

Substantively, claims 1-15 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Gillings et al. (U.S. Patent No. 5,666,490). This rejection is respectfully, but most strenuously, traversed and its reconsideration is requested to any extent deemed applicable to the amended claims presented herewith.

An “obviousness” determination requires an evaluation of whether the prior art taken as a whole would suggest the claimed invention taken as a whole to one of ordinary skill in the art. In evaluating claimed subject matter as a whole, the Federal Circuit has expressly mandated that functional claim language be considered in evaluating the claim relative to the prior art. Applicants respectfully submit that the application of these standards to the independent claims presented herewith leads to the conclusion that the recited subject matter would not have been obvious to one of ordinary skill in the art based on the applied patent. Rather, in analyzing the independent claims presented herewith “as a whole”, it is respectfully submitted that there are numerous features of applicants' claimed technique which are simply not taught, suggested or implied by Gillings et al.

Applicants recite a method of invoice entry (e.g., claim 1) which includes entering data from an invoice, by a first person, into a first database having a status indicator associated with the data from the invoice, and setting the status indicator to entered. Accuracy is insured by a subset of the data from the invoice then being entered by a second person different from the first

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person, into the same database. The technique then matches the subset of data entered by the second person with the corresponding subset of data entered by the first person and highlights any unmatched entries. This is an audit of the data entered by the first person into the database. Subsequent to the matching step, any unmatched entries are re-entered by the second person, and the status indicator is changed to audit passed or the status indicator is set to audit failed, or the status is set to audit passed if there are no unmatched entries. Thereafter, the entered invoice data by the first person is posted to a second database if the status indicator is audit passed, otherwise, the first person re-enters the unmatched entries, and changes the status indicator to re-entered, and thereafter proceeds to the matching step, or changes the status indicator to cancel, thereby canceling the data entered by the first person. While data is being entered by the first and/or second person, a length of time that the status indicator has one or more of the entered setting, audit passed setting, audit failed setting, and re-entered setting is tracked. This length of time can then be employed to audit the invoice entry process. (Additionally as recited in new claims 16 and 17, entered invoice data can be deleted from the first database if the length of time that the status indicator has had one or more of the settings exceed a predefined threshold.)

Although Gillings et al. does discuss a technique for accurately entering data into a document management system, the process described therein does not teach, suggest or imply the functionality of applicants' claims when viewed "as a whole". By way of example, and as acknowledged in the Office Action, Gillings et al. did not disclose entering data from an invoice. The Office Action, however, alleges that it would have been obvious to one of ordinary skill in the art to employ the teachings of Gillings et al. with entering of data from an invoice. This conclusion is respectfully traversed. A careful reading of Gillings et al. fails to uncover any suggestion or implication that the information in the electronic document management system was or should have been entered from an invoice. Gillings et al. expressly teach that the purpose of their patent is to manage scientific case report forms. Gillings et al. do not discuss invoices, nor do they address any need for accurately entering data from an invoice into a database. Gillings et al. discuss entering data from a "specific case report form" only.

Further, and more particular to the amended claims presented herewith, applicants recite the entering of data from an invoice, by a first person, into a database having a status indicator associated with the data from the invoice, and setting status indicator to entered. As applicants data invoice entry process proceeds, the status indicator is changed between one or more of the entered setting, an audit passed setting, an audit failed setting, and a re-entered setting. The Office Action acknowledges that Gillings et al. do not disclose a status indicator. Applicants further submit that Gillings et al. do not disclose the use of a status indicator as an integral part of a data invoice entry process such as recited by applicants. As summarized above, the status indicator is repeatedly modified depending upon the success of the data invoice entry process. The status of the indicator is then used in a conditional statement in deciding how to proceed through the functionality recited. Because applicants status indicator is an inherent part of the process, applicants respectfully submit that the Office Action fails to state a prima facie case of obviousness against the independent claims presented by simply alleging that status indicators are common in the art. Applicants are not merely reciting a status indicator, but rather reciting functionality that is entwined with the various states of the status indicator. A careful reading of Gillings et al. fails to uncover any suggestion or implication of such functionality.

Additionally, applicants independent claims recite tracking a length of time that the status indicator has one of an entered setting, an audit passed setting, an audit failed setting, and a re-entered setting. This length of time is then employed to audit the invoice entry process. Since Gillings et al. do not disclose a status indicator per se, there is clearly no teaching, suggesting or implication therein of tracking a length of time that the status indicator has a particular setting or of using that length of time to audit the invoice entry process.

Further, and as acknowledged in the Office Action, Gillings et al. do not disclose applicants recited functionality of re-entering any unmatched entries by the first person (nor changing the status indicator to re-entered and thereafter proceeding to the matching step, or changing the status indicator, by the first person to cancel). A careful reading of Gillings et al. fails to uncover any discussion of re-entering data by the first person (or of changing the status indicator to re-entered and thereafter proceeding to the matching step, or changing the status

indicator by the first person to cancel). The Office Action simply alleges that re-entering the data by the first person in order to resolve the discrepancies, as taught by Gillings et al., would be obvious without any support for this conclusion.

Still further, applicants' respectfully submit that the independent claims presented recite posting the entered invoice data by the first person to a second database if the status indicator is audit passed. This step of posting the entered invoice data by the first person to the second database if the status indicator is audit passed is simply not taught, suggested or implied by Gillings et al. Further, the Office Action does not appear to address this aspect of applicants' independent claims. Gillings et al. do not teach moving data to a second database once the accuracy of the entered invoice data has been ensured and the status indicator is audit passed. Using applicants approach, the first database may comprise a data changeable database as represented by the re-entering step, while the second database is the ultimate database to which the data is to be posted. Gillings et al. do not suggest or imply such a technique. Only audit passed data in applicants' invention is moved to the second database. Gillings et al. do not provide any suggestion or implication that the technique thereof should be extended in this manner.

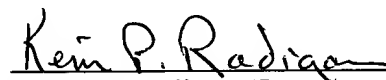
To summarize, there are numerous and significant differences between applicants' recited invention and the document management system of Gillings et al. As recognized in the Office Action, Gillings et al. do not disclose a status indicator per se. Thus, Gillings et al. do not disclose the use of a status indicator in a particular process such as recited by applicants, nor the tracking of a length of time that a status indicator has one or more of an entered setting, an audit passed setting, an audit failed setting, and a re-entered setting. This tracking of the length of time that the status indicator has a particular setting is employed to audit the invoice entry process. Still further, Gillings et al. fail to teach that data is entered from an invoice, or that any unmatched entries are re-entered by the first person, or the posting of entered invoice data by the first person to a second database if the status indicator is audit passed. The process of Gillings et al. simply does not describe applicants particular data invoice entry technique as recited in the independent claims presented when viewed "as a whole".

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For all the above reasons, applicants respectfully request reconsideration and withdrawal of the obviousness rejection to the independent claims presented herewith based upon the teachings of Gillings et al. The dependent claims are believed allowable for the same reasons as the independent claims, as well as for their own additional characterizations. For example, new claims 16 & 17 further recite deleting entered invoice data from the first database if the length of time that the status indicator has had one of the settings exceeds a defined threshold. Since Gillings et al. do not even disclose the use of a status indicator, the applied art clearly does not teach, suggest or imply tracking the length of time that a status indicator has a particular setting, and deleting entered invoice data from a first database if that length of time exceeds a defined threshold. For this reason, allowance of these claims is requested.

If the Examiner wishes to discuss this application with applicants' attorney, the Examiner is invited to contact their below-listed representative. The application is believed to be in condition for allowance and such action is respectfully requested.

Respectfully submitted,



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